



January 21, 2021

Lt. Col. Mike Dunlap
Wisconsin Air National Guard; 115CES/CEIE
Dane County Regional Airport
3110 Mitchell Street, Building 1210
Madison WI 53704

Subject: Materials Management Plan for Flight Simulator Building, BRRTs # 02-13-585319

Dear Lt. Col. Dunlap:

The Department of Natural Resources (DNR) has reviewed the draft materials management plan (MMP) that the Wisconsin Air National Guard (WANG) submitted to DNR on December 3, 2020. The document outlines how WANG intends to handle contaminated soil and groundwater that may be encountered during construction of the flight simulator building. WANG has informed DNR that this is the first of several MMPs for necessary construction activities in advance of F-35 jets arriving at Truax Field in April 2023. DNR anticipates receiving an MMP for each construction project where soil, and as needed groundwater, removal will be needed to accomplish the construction task. WANG has requested comments on the MMP.

The MMP received on December 3, 2020, included a report on soil and groundwater samples which were collected from eight locations near the planned flight simulator building. The sampling results show PFAS compounds were encountered in groundwater at each sampling location. Detections of PFAS in soil were found at three sampling locations.

DNR has several comments on the submitted MMP. First, the MMP contains information beyond what is needed for such a plan or that is not applicable to such a plan. WANG will have two media to address in this project and other future F-35 construction projects: soil and groundwater. Sections 5 and 7 of the MMP contain information that is relevant for properly handling soil and groundwater. Outlining how contaminated soil and groundwater will be properly addressed are the key components of a MMP for this site. Subject to additional comments below, DNR recommends that WANG review the available soil and groundwater data and re-submit an MMP that addresses these two media.

Second, the first part of Section 5 indicates that all soil that is excavated from this project, and not reused in the project, will be taken to a solid waste landfill. This is an appropriate method for handling excess soil. Solid waste landfills in Wisconsin make the decision as to which wastes they will and will not accept. WANG will need to arrange with the landfill for accepting the material. If an alternative method of soil management is desired, WANG must discuss the proposed management alternative with DNR prior to implementing.

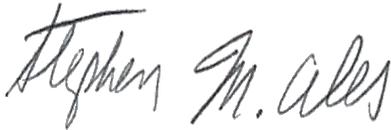
Third, Section 7 indicates that dewatering is not anticipated for this project. This is based on the depth to water from soil borings completed at this location and from experience WANG has gained from other projects at WANG completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered, the MMP states the water will be containerized and sampled, and WANG will work with the DNR to review options for disposing the water based

on sampling results. Potential options include seeking a WPDES permit for treatment and discharge into surface water or discharging to the Madison Metropolitan Sewerage District.

In addition to the flight simulator building, DNR understands that additional construction activities are planned for Truax Field. WANG should submit an individual MMP for each project. MMPs for those projects should focus on exactly how WANG intends to address soil and groundwater at each location. And as with the MMP for the flight simulator building, WANG should include with each submittal the soil and groundwater sample results for each project.

Please feel free to contact me at stephenm.ales@wisconsin.gov and 608-400-9187 if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Stephen M. Ales". The signature is written in a cursive, slightly slanted style.

Stephen M. Ales, P.G.
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources

Cc: Steve Martin – DNR, South Central Region
Lt. Col. Dan Statz – sent electronically to: daniel.statz.1@us.af.mil